

Ashley M. Simonsen (Bar No. 275203)
COVINGTON & BURLING LLP
1999 Avenue of the Stars
Los Angeles, California 90067
Telephone: (424) 332-4800
Facsimile: (424) 332-4749
Email: asimonsen@cov.com

*Attorneys for Defendants Meta Platforms, Inc.
f/k/a Facebook, Inc.; Facebook Holdings, LLC;
Facebook Operations, LLC; Meta Payments Inc.
f/k/a Facebook Payments Inc.; Meta Platforms
Technologies, LLC f/k/a Facebook Technologies,
LLC; Instagram, LLC; and Siculus LLC f/k/a
Siculus, Inc.*

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

MDL No. 3047

Case No.: 4:22-md-03047-YGR

This Document Relates To:

**TEMPORARY SEALING MOTION RE
DEFENDANTS' NOTICE OF MOTION
AND MOTION TO EXCLUDE
TESTIMONY OF SCHOOL DISTRICT
EXPERTS**

ALL ACTIONS

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

Pursuant to the Court's Order Setting Sealing Procedures (ECF No. 341), Defendants submit this Temporary Sealing Motion regarding Defendants' Motion to Exclude Testimony of School District Experts. Pursuant to that Order, the reasons for sealing (if any) will be addressed in a forthcoming omnibus stipulation or omnibus motion.

Docket No.	Document	Whether document contains a Party's Confidential Information
ECF No. 2291-1	Motion for Exclude Testimony of School District Experts and Memorandum of Points and Authorities	Not redacted or sealed
ECF No. 2291-2	Declaration of Ashley M. Simonsen	Not redacted or sealed
ECF No. 2291-3	Ex. 1, May 16, 2025 Expert Report of Dr. Sharon Hoover	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-4	Ex. 2, June 20, 2025 Amended Expert Report of Dr. Sharon Hoover for Breathitt County Board of Education	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-5	Ex. 3, June 20, 2025 Amended Expert Report of Dr. Sharon Hoover for Charleston County School District	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-6	Ex. 4, June 20, 2025 Amended Expert Report of Dr. Sharon Hoover for DeKalb County School District	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-7	Ex. 5, June 20, 2025 Amended Expert Report of Dr. Sharon Hoover for Board of Education Harford County	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-8	Ex. 6, June 20, 2025 Amended Expert Report of Dr. Sharon Hoover for Irvington Public Schools	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-9	Ex. 7, June 20, 2025 Amended Expert Report of Dr. Sharon Hoover for Tucson Unified School District	Temporarily filing under seal because document contains information that the parties may consider to be confidential
ECF No. 2291-10	Ex. 8, August 7, 2025 Amended Rebuttal Report of Dr. Sharon Hoover for Breathitt County	Temporarily filing under seal because document contains information that the parties may consider to be confidential

1	ECF No. 2291-11	Ex. 9, August 1, 2025 Rebuttal Report of Dr. Sharon Hoover for Charleston County School District	Temporarily filing under seal because document contains information that the parties may consider to be confidential
2	ECF No. 2291-12	Ex. 10, August 7, 2025 Amended Rebuttal Report of Dr. Sharon Hoover for DeKalb County School District	Temporarily filing under seal because document contains information that the parties may consider to be confidential
3	ECF No. 2291-13	Ex. 11, August 1, 2025 Rebuttal Report of Dr. Sharon Hoover for Harford County Public Schools	Temporarily filing under seal because document contains information that the parties may consider to be confidential
4	ECF No. 2291-14	Ex. 12, August 7, 2025 Amended Rebuttal Report of Dr. Sharon Hoover for Irvington Public Schools	Temporarily filing under seal because document contains information that the parties may consider to be confidential
5	ECF No. 2291-15	Ex. 13, August 7, 2025 Amended Rebuttal Report of Dr. Sharon Hoover for Tucson Unified School District	Temporarily filing under seal because document contains information that the parties may consider to be confidential
6	ECF No. 2291-16	Ex. 14, May 18, 2025 Expert Report of Robert Klein for Breathitt County School District	Not redacted or sealed
7	ECF No. 2291-17	Ex. 15, May 18, 2025 Expert Report of Robert Klein for Charleston County School District	Not redacted or sealed
8	ECF No. 2291-18	Ex. 16, May 18, 2025 Expert Report of Robert Klein for DeKalb County School District	Not redacted or sealed
9	ECF No. 2291-19	Ex. 17, May 18, 2025 Expert Report of Robert Klein for Harford County Public Schools	Not redacted or sealed
10	ECF No. 2291-20	Ex. 18, May 18, 2025 Expert Report of Robert Klein for Irvington Public Schools	Not redacted or sealed
11	ECF No. 2291-21	Ex. 19, May 18, 2025 Expert Report of Robert Klein for Tucson Unified School District	Not redacted or sealed
12	ECF No. 2291-22	Ex. 20, August 1, 2025 Rebuttal Report of Robert Klein for Breathitt County School District	Not redacted or sealed
13	ECF No. 2291-23	Ex. 21, August 1, 2025 Rebuttal Report of Robert Klein for Charleston County School District	Not redacted or sealed
14	ECF No. 2291-24	Ex. 22, August 1, 2025 Rebuttal Report of Robert Klein for DeKalb County School District	Not redacted or sealed

1	ECF No. 2291-25	Ex. 23, August 1, 2025 Rebuttal Report of Robert Klein for Harford County Public Schools	Not redacted or sealed
2	ECF No. 2291-26	Ex. 24, August 1, 2025 Rebuttal Report of Robert Klein for Irvington Public Schools	Not redacted or sealed
3	ECF No. 2291-27	Ex. 25, August 1, 2025 Rebuttal Report of Robert Klein for Tucson Unified School District	Not redacted or sealed
4	ECF No. 2291-28	Ex. 26, June 20, 2025 Amended Expert Report of Dr. Douglas Leslie for Breathitt County Board of Education	Temporarily filing under seal because document contains information that the parties may consider to be confidential
5	ECF No. 2291-29	Ex. 27, June 20, 2025 Amended Expert Report of Dr. Douglas Leslie for Charleston County School District	Temporarily filing under seal because document contains information that the parties may consider to be confidential
6	ECF No. 2291-30	Ex. 28, June 20, 2025 Amended Expert Report of Dr. Douglas Leslie for DeKalb County School District	Temporarily filing under seal because document contains information that the parties may consider to be confidential
7	ECF No. 2291-31	Ex. 29, June 20, 2025 Amended Expert Report of Dr. Douglas Leslie for Board of Education Harford County	Temporarily filing under seal because document contains information that the parties may consider to be confidential
8	ECF No. 2291-32	Ex. 30, June 20, 2025 Amended Expert Report of Dr. Douglas Leslie for Irvington Public Schools	Temporarily filing under seal because document contains information that the parties may consider to be confidential
9	ECF No. 2291-33	Ex. 31, June 20, 2025 Amended Expert Report of Dr. Douglas Leslie for Tucson Unified School District	Temporarily filing under seal because document contains information that the parties may consider to be confidential
10	ECF No. 2291-34	Ex. 32, August 1, 2025 Rebuttal Report of Dr. Douglas Leslie for Breathitt County Board of Education	Temporarily filing under seal because document contains information that the parties may consider to be confidential
11	ECF No. 2291-35	Ex. 33, August 1, 2025 Rebuttal Report of Dr. Douglas Leslie for Charleston County Board of Education	Temporarily filing under seal because document contains information that the parties may consider to be confidential
12	ECF No. 2291-36	Ex. 34, August 1, 2025 Rebuttal Report of Dr. Douglas Leslie for DeKalb County School District	Temporarily filing under seal because document contains information that the parties may consider to be confidential
13	ECF No. 2291-37	Ex. 35, August 1, 2025 Rebuttal Report of Dr. Douglas Leslie for Board of Education Harford County	Temporarily filing under seal because document contains

		information that the parties may consider to be confidential
1	2	3
ECF No. 2291-38	Ex. 36, August 1, 2025 Rebuttal Report of Dr. Douglas Leslie for Irvington Public Schools	Temporarily filing under seal because document contains information that the parties may consider to be confidential
4	5	6
ECF No. 2291-39	Ex. 37, August 1, 2025 Rebuttal Report of Dr. Douglas Leslie for Tucson Unified School District	Temporarily filing under seal because document contains information that the parties may consider to be confidential
7	8	9
ECF No. 2291-40	Ex. 38, May 19, 2025 Expert Report of Jeffrey Meyers for Breathitt County Board of Education	Temporarily filing under seal because document contains information that the parties may consider to be confidential
10	11	12
ECF No. 2291-41	Ex. 39, May 19, 2025 Expert Report of Jeffrey Meyers for Charleston County Board of Education	Temporarily filing under seal because document contains information that the parties may consider to be confidential
13	14	15
ECF No. 2291-42	Ex. 40, May 19, 2025 Expert Report of Jeffrey Meyers for DeKalb County School District	Temporarily filing under seal because document contains information that the parties may consider to be confidential
16	17	18
ECF No. 2291-43	Ex. 41, May 19, 2025 Expert Report of Jeffrey Meyers for Board of Education of Harford County	Temporarily filing under seal because document contains information that the parties may consider to be confidential
19	20	21
ECF No. 2291-44	Ex. 42, May 19, 2025 Expert Report of Jeffrey Meyers for Irvington Public Schools	Temporarily filing under seal because document contains information that the parties may consider to be confidential
22	23	24
ECF No. 2291-45	Ex. 43, May 19, 2025 Expert Report of Jeffrey Meyers for Tucson Unified School District	Temporarily filing under seal because document contains information that the parties may consider to be confidential
25	26	27
ECF No. 2291-46	Ex. 44, July 25, 2025 Expert Reply Report of Jeffrey Meyers for Breathitt County Board of Education	Temporarily filing under seal because document contains information that the parties may consider to be confidential
28	29	30
ECF No. 2291-47	Ex. 45, July 25, 2025 Expert Reply Report of Jeffrey Meyers for Charleston County Board of Education	Temporarily filing under seal because document contains information that the parties may consider to be confidential
31	32	33
ECF No. 2291-48	Ex. 46, July 25, 2025 Expert Reply Report of Jeffrey Meyers for DeKalb County School District	Temporarily filing under seal because document contains information that the parties may consider to be confidential

1	ECF No. 2291-49	Ex. 47, July 25, 2025 Expert Reply Report of Jeffrey Meyers for Board of Education of Harford County	Temporarily filing under seal because document contains information that the parties may consider to be confidential
2	ECF No. 2291-50	Ex. 48, July 25, 2025 Expert Reply Report of Jeffrey Meyers for Irvington Public Schools	Temporarily filing under seal because document contains information that the parties may consider to be confidential
3	ECF No. 2291-51	Ex. 49, July 25, 2025 Expert Reply Report of Jeffrey Meyers for Irvington Public Schools	Temporarily filing under seal because document contains information that the parties may consider to be confidential
4	ECF No. 2291-52	Ex. 50, May 16, 2025 Expert Report of Dr. Brian Osborne	Temporarily filing under seal because document contains information that the parties may consider to be confidential
5	ECF No. 2291-53	Ex. 51, July 30, 2025 Rebuttal Expert Report of Dr. Brian Osborne	Temporarily filing under seal because document contains information that the parties may consider to be confidential
6	ECF No. 2291-54	Ex. 52, May 19, 2025 Expert Report of Dr. Bryce Ward for Breathitt County Schools	Temporarily filing under seal because document contains information that the parties may consider to be confidential
7	ECF No. 2291-55	Ex. 53, May 19, 2025 Expert Report of Dr. Bryce Ward for Charleston County School District	Temporarily filing under seal because document contains information that the parties may consider to be confidential
8	ECF No. 2291-56	Ex. 54, May 19, 2025 Expert Report of Dr. Bryce Ward for DeKalb County School District	Temporarily filing under seal because document contains information that the parties may consider to be confidential
9	ECF No. 2291-57	Ex. 55, May 19, 2025 Expert Report of Dr. Bryce Ward for Harford County Public Schools	Temporarily filing under seal because document contains information that the parties may consider to be confidential
10	ECF No. 2291-58	Ex. 56, May 19, 2025 Expert Report of Dr. Bryce Ward for Irvington Public Schools	Temporarily filing under seal because document contains information that the parties may consider to be confidential
11	ECF No. 2291-59	Ex. 57, May 19, 2025 Expert Report of Dr. Bryce Ward for Tucson Unified School District	Temporarily filing under seal because document contains information that the parties may consider to be confidential
12	ECF No. 2291-60	Ex. 58, July 31, 2025 Expert Reply Report of Dr. Bryce Ward for Breathitt County Schools	Temporarily filing under seal because document contains

		information that the parties may consider to be confidential
1	2	3
ECF No. 2291-61	Ex. 59, July 31, 2025 Expert Reply Report of Dr. Bryce Ward for Charleston County School District	Temporarily filing under seal because document contains information that the parties may consider to be confidential
4	5	6
ECF No. 2291-62	Ex. 60, July 31, 2025 Expert Reply Report of Dr. Bryce Ward for DeKalb County School District	Temporarily filing under seal because document contains information that the parties may consider to be confidential
7	8	9
ECF No. 2291-63	Ex. 61, July 31, 2025 Expert Reply Report of Dr. Bryce Ward for Harford County Public Schools	Temporarily filing under seal because document contains information that the parties may consider to be confidential
10	11	12
ECF No. 2291-64	Ex. 62, July 31, 2025 Expert Reply Report of Dr. Bryce Ward for Irvington Public Schools	Temporarily filing under seal because document contains information that the parties may consider to be confidential
13	14	15
ECF No. 2291-65	Ex. 63, July 31, 2025 Expert Reply Report of Dr. Bryce Ward for Tucson Unified School District	Temporarily filing under seal because document contains information that the parties may consider to be confidential
16	17	18
ECF No. 2291-66	Ex. 64, Volume 1 of Dr. Sharon Hoover's Deposition, taken August 12, 2025	Temporarily filing under seal because document contains information that the parties may consider to be confidential
19	20	21
ECF No. 2291-67	Ex. 65, Volume 2 of Dr. Sharon Hoover's deposition, taken August 13, 2025	Temporarily filing under seal because document contains information that the parties may consider to be confidential
22	23	24
ECF No. 2291-68	Ex. 66, September 5, 2025 deposition of Robert Klein	Temporarily filing under seal because document contains information that the parties may consider to be confidential
25	26	27
ECF No. 2291-69	Ex. 67, August 27, 2025 deposition of Dr. Douglas Leslie	Temporarily filing under seal because document contains information that the parties may consider to be confidential
28	29	30
ECF No. 2291-70	Ex. 68, August 22, 2025 deposition of Jeffrey Meyers	Temporarily filing under seal because document contains information that the parties may consider to be confidential
31	32	33
ECF No. 2291-71	Ex. 69, September 4, 2025 deposition of Dr. Brian Osborne	Temporarily filing under seal because document contains information that the parties may consider to be confidential

1	ECF No. 2291-72	Ex. 70, August 15, 2025 deposition of Dr. Bryce Ward	Temporarily filing under seal because document contains information that the parties may consider to be confidential
2	ECF No. 2291-73	Ex. 71, Materials Considered List (Exhibit B) to Dr. Brian Osborne's May 16, 2025 Expert Report	Temporarily filing under seal because document contains information that the parties may consider to be confidential
3	ECF No. 2291-74	Ex. 72, Federal Judicial Center's <i>Reference Guide on Survey Research</i> , 359 Fed. Judicial Ctr. & Nat'l Academies Press (3rd ed. 2011)	Not redacted or sealed
4	ECF No. 2291-75	Ex. 73, <i>Improving the Quality of Retrospective Reports: Calendar Interviewing Methodologies</i> , Program in Survey Research & Methodology (Working Paper No. 12)	Not redacted or sealed
5	ECF No. 2291-76	Ex. 74, <i>Evaluating Survey Quality in Today's Complex Environment</i> , Am. Ass'n for Pub. Opinion Research (2016)	Not redacted or sealed
6	ECF No. 2291-77	Ex. 75, <i>School Counselor Roles & Ratios</i> (2025)	Not redacted or sealed
7	ECF No. 2291-78	Ex. 76, SHAPE District Profile for Breathitt County Schools (2019)	Not redacted or sealed
8	ECF No. 2291-79	Ex. 77, SHAPE District Profile for DeKalb County School District (2019)	Not redacted or sealed
9	ECF No. 2291-80	Ex. 78, DeKalb County School District's Third Amended Plaintiff Fact Sheet	Designated confidential by Plaintiff
10	ECF No. 2291-81	Ex. 79, July 30, 2025 Rebuttal Report of Dr. Sharon Hoover	Temporarily filing under seal because document contains information that the parties may consider to be confidential
11	ECF No. 2291-82	Ex. 80, June 6, 2025 thread involving Melissa Yeates, Joseph Sandoval-Bushur, and others	Not redacted or sealed
12	ECF No. 2291-83	Ex. 81, cited excerpts of Julia Shivandona's April 8, 2025 Rule 30(b)(6) deposition	Not redacted or sealed
13	ECF No. 2291-84	Ex. 82, Common Core of Data – America's Public Schools (2023 – 2024)	Not redacted or sealed
14	ECF No. 2291-85	Ex. 83, <i>The Professional Standards of the National Association of School Psychologists</i> (2019)	Not redacted or sealed
15	ECF No. 2291-86	Ex. 84, May 2, 2025 Affidavit of Daphne Noble	Not redacted or sealed
16	ECF No. 2291-87	Ex. 85, May 13, 2025 Affidavit of Dr. April Vauss	Not redacted or sealed
17	ECF No. 2291-88	Ex. 86, May 15, 2025 Affidavit of Lisa Allison	Not redacted or sealed

1	ECF No. 2291-89	Ex. 87, May 16, 2025 Affidavit of Monika Davis	Not redacted or sealed
2	ECF No. 2291-90	Ex. 88, May 5, 2025 Affidavit of Phillip Watts	Not redacted or sealed
3	ECF No. 2291-91	Ex. 89, May 13, 2025 Declaration of Holly Hammel	Not redacted or sealed
4	ECF No. 2291-92	Ex. 90, Plaintiff Board of Education of Harford County's Amended Responses and Objections to Defendants' Interrogatories (Set 3), dated April 14, 2025	Designated confidential by Plaintiff
5	ECF No. 2291-93	Ex. 91, cited excerpts of the May 7, 2025 deposition of Bernard Hennigan	Not redacted or sealed
6	ECF No. 2291-94	Ex. 92, May 16, 2025 Rule 30(b)(6) deposition of Dr. April Vauss	Not redacted or sealed
7	ECF No. 2291-95	Ex. 93, cited excerpts of the June 30, 2025 deposition of Julie Shivandona	Not redacted or sealed
8	ECF No. 2291-96	Ex. 94, cited excerpts of the Rule 30(b)(6) deposition of Andrew Moore	Not redacted or sealed
9	ECF No. 2291-97	Ex. 95, cited excerpts of the Rule 30(b)(6) deposition of Robert Ross	Not redacted or sealed
10	ECF No. 2291-98	Ex. 96, cited excerpts of the May 23, 2025 deposition of Sabrina Salmon	Not redacted or sealed
11	ECF No. 2291-99	Proposed Order	Not redacted or sealed

15
16
17 DATED: September 30, 202518
19
20 Respectfully submitted,
By: /s/ Ashley M. Simonsen21
22 Ashley M. Simonsen (Bar No. 275203)
23 COVINGTON & BURLING LLP
24 1999 Avenue of the Stars
25 Los Angeles, California 90067
26 Telephone: (424) 332-4800
27 Facsimile: (424) 332-4749
28 Email: asimonsen@cov.com29
30 *Attorneys for Defendants Meta Platforms, Inc.
f/k/a Facebook, Inc.; Facebook Holdings,
LLC; Facebook Operations, LLC; Meta
Payments, Inc. f/k/a Facebook Payments, Inc.;
Meta Platforms Technologies, LLC f/k/a*

Facebook Technologies, LLC; Instagram, LLC; and Siculus LLC f/k/a Siculus, Inc.

1 **CERTIFICATE OF SERVICE**

2 The undersigned hereby certifies that a copy of the foregoing and its attachments will be served
3 electronically on counsel for Plaintiffs to the email addresses that were designated by counsel for that
4 purpose

5 I declare under penalty of perjury of the laws of the United States that the foregoing is true and
6 correct.

7 Executed on September 30, 2025.

8 /s/ Ashley M. Simonsen

9 Ashley M. Simonsen

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28